

From: [MichaelA Flagg](#)
To: [Flagg, MichaelA](#)
Subject: Fw: ANP question- row 63, sampling schedule for PM2.5
Date: Wednesday, August 14, 2013 5:18:57 PM

Michael Flagg
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----- Forwarded by MichaelA Flagg/R9/USEPA/US on 08/14/2013 05:18 PM -----

From: Meredith Kurpius/R9/USEPA/US
To: MichaelA Flagg/R9/USEPA/US@EPA,
Cc: Dena Vallano/R9/USEPA/US@EPA, Elfego Felix/R9/USEPA/US@EPA, Gwen Yoshimura/R9/USEPA/US@EPA, Katherine Hoag/R9/USEPA/US@EPA
Date: 11/09/2012 09:37 AM
Subject: Re: ANP question- row 63, sampling schedule for PM2.5

Same thought here.

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Meredith Kurpius, PhD  
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▼ MichaelA Flagg---11/09/2012 08:48:08 AM---Hi Gwen, My initial thoughts are that we would not require a waiver for more frequent sampling than

From: MichaelA Flagg/R9/USEPA/US  
To: Gwen Yoshimura/R9/USEPA/US@EPA,  
Cc: Dena Vallano/R9/USEPA/US@EPA, Elfego Felix/R9/USEPA/US@EPA, Katherine Hoag/R9/USEPA/US@EPA, Meredith Kurpius/R9/USEPA/US@EPA  
Date: 11/09/2012 08:48 AM  
Subject: ANP question- row 63, sampling schedule for PM2.5

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Hi Gwen,

My initial thoughts are that we would not require a waiver for more frequent sampling than what is required. ;)

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-----Gwen Yoshimura/R9/USEPA/US wrote: -----

To: MichaelA Flagg/R9/USEPA/US@EPA, Dena Vallano/R9/USEPA/US@EPA, Elfego Felix/R9/USEPA/US@EPA, Katherine Hoag/R9/USEPA/US@EPA, Meredith Kurpius/R9/USEPA/US@EPA  
From: Gwen Yoshimura/R9/USEPA/US  
Date: 11/09/2012 08:44AM  
Subject: ANP question- row 63, sampling schedule for PM2.5

Goodness, I'm sorry, I have another question, this one concerning waivers for PM2.5 sampling schedules.

Bay Area has two remaining FRMs. One is at San Jose, where there's also (now) a FEM BAM, and one is at Concord, where there isn't any continuous monitoring. Both FRMs are sampling on a seasonal schedule, switching from 1:1 to 1:3.

If I'm reading 58.12(d) correctly, they don't have to be at every day sampling unless it's the DV site for the area and are within +/- 5% of the annual or 24 hour NAAQS. Neither site meets either of these criteria. Therefore, they are required to sample at 1:3.

If that's correct, does Bay Area need a waiver for the seasonal sampling schedule? (It'd be a waiver for increasing their sampling schedule for 6 months out of the year from what is required, which seems weird. Right?)

(and if the San Jose BAM is now their primary, then this question only applies to Concord.)

Thanks!

-Gwen

MichaelA Flagg---11/09/2012 07:49:07 AM---Matt, It appears that I have incorrectly compiled my lists, which included everything that is wrong

From: MichaelA Flagg/R9/USEPA/US  
To: Matthew Lakin/R9/USEPA/US@EPA,  
Cc: Meredith Kurpius/R9/USEPA/US@EPA, Gwen Yoshimura/R9/USEPA/US@EPA, Katherine Hoag/R9/USEPA/US@EPA, Dena Vallano/R9/USEPA/US@EPA, Elfego Felix/R9/USEPA/US@EPA  
Date: 11/09/2012 07:49 AM  
Subject: Re: Requirements not met for Great Basin & Pinal County \_ PLEASE USE THIS LIST

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Matt,

It appears that I have incorrectly compiled my lists, which included everything that is wrong with the plan. Below is a revised list that only reflects major and non-major issues that we know are not meeting the requirement.

Great Basin Major:  
- None

Great Basin Non-Major:  
- System modification (shutdown/move of the Flat Rock site) was implemented but not approved by EPA. Information in plan is insufficient to approve the modification (i.e. 58.14 criteria not mentioned or analyzed).  
- PM10 semi-annual flow audits may not be performed at the correct frequency (i.e. only 1-2 months

apart, where requirement is 5-7 months).

Pinal Major:

- None

Pinal Non-Major

- Not meeting PM2.5 collocation requirements.
- Not meeting PM2.5 collocation requirements.
- Sampling frequency at Casa Grande PM2.5 is inappropriate. Plan states waiver was granted in 2008, but documentation not included.
- Do not operate any continuous PM2.5 monitors as required.

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-----Forwarded by MichaelA Flagg/R9/USEPA/US on 11/09/2012 07:35AM -----

To: Matthew Lakin/R9/USEPA/US@EPA

From: MichaelA Flagg/R9/USEPA/US

Date: 11/08/2012 05:21PM

Cc: Elfego Felix/R9/USEPA/US@EPA, Gwen Yoshimura/R9/USEPA/US@EPA, Katherine

Hoag/R9/USEPA/US@EPA, Meredith Kurpius/R9/USEPA/US@EPA, Dena

Vallano/R9/USEPA/US@EPA

Subject: Re: Requirements not met for Great Basin & Pinal County

Matt,

Here are my major and non-major deficiencies for Great Basin:

Major:

None

Non-Major

Do not include statement of purpose for each monitor

Moved a PM10 site (non-design value site) without EPA approval. Appropriate information not included in plan

Limited information about NCORE monitoring

Method codes not identified for some monitors

Sampling schedule information is incomplete/unclear

Incorrect scale information for one site

Do not document how the agency will review changes to PM2.5 network

Did not mention precision/accuracy reports

Did not mention data certification

Did not include frequency of one-point QC checks for gaseous pollutants

Did not include date of last PE for gaseous pollutants

Information suggests that they may not be meeting the requirement for semi-annual flow audit frequency.

Collocation information insufficient to judge

Complete start date not included

Did not identify monitor type for each monitor

Did not identify monitoring objective for each site

Did not include parameter code for each monitor

Did not include complete POC information  
Do not include traffic counts  
Do not include distance from supporting structure  
Do not include probe material  
Do not include residence time

Here are my major and non-major deficiencies for Pinal County

Plan was 2 days late  
Documentation for previous shutdowns was not included  
PM2.5 collocation not being met  
PM10 collocation not being met  
Full start date not included  
Incorrect information for monitor types  
Ozone season waiver not included  
Sampling frequency for Casa Grande may be inappropriate - waiver not included  
Do not operate any continuous PM2.5 monitors as required  
Distance to supporting structure not included  
Distance from obstructions on roof not included

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Dena Vallano---11/08/2012 04:27:33 PM---Hi Matt/Meredith, Here are my major and non-major deficiencies for Hawaii:

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To: Matthew Lakin/R9/USEPA/US@EPA,  
Cc: Elfego Felix/R9/USEPA/US@EPA, Gwen Yoshimura/R9/USEPA/US@EPA, Katherine Hoag/R9/USEPA/US@EPA, MichaelA Flagg/R9/USEPA/US@EPA, Meredith Kurpius/R9/USEPA/US@EPA  
Date: 11/08/2012 04:27 PM  
Subject: Requirements not met for HI and SD ANPs

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Hi Matt/Meredith,

Here are my major and non-major deficiencies for Hawaii:

Major:  
None

Non-major:  
Lacks documentation for system modifications that have been approved since last ANP approval  
No information provided for annual data certification at Kona site  
No information provided for frequency of 1-pt flow rate verification for Pb samplers audit  
Dates not provided for last two-semi-annual flow rate audits for PM and Pb monitors  
Missing/TBD instrument/monitoring methods code for TSP-Pb monitor at KA NCore station  
Does not specify background or transport sites for PM2.5  
Trees too close at NI (5.2m), HL (4.6m), and OV (7m) sites

And my major and non-major deficiencies for San Diego:

Major:  
None

Non-major:

30-day public comment/inspection period occurred after submission to EPA (July 1-31, 2012)  
Lacks documentation for system modifications that have been approved since last ANP approval  
Pb monitoring started after 1/1/2011 for ECA NCore site  
Pb monitor at ECA not designated as either source-oriented or non-source-oriented  
Pb monitoring did not start at airports until 2012  
PM10 probe height is too short at DVN (1.5m), CRQ (1.5m), and SEE (1.5m)  
Trees are too close at CVA DMR, and OTM (<10m) for multiple pollutants including ozone

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Meredith Kurpius---11/08/2012 10:55:02 AM---Matt, Here are my major and non-major examples of requirements not being met.

From: Meredith Kurpius/R9/USEPA/US  
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Cc: Elfego Felix/R9/USEPA/US@EPA, Gwen Yoshimura/R9/USEPA/US@EPA, Katherine Hoag/R9/USEPA/US@EPA, MichaelA Flagg/R9/USEPA/US@EPA, Dena Vallano/R9/USEPA/US@EPA  
Date: 11/08/2012 10:55 AM  
Subject: requirements not met for SC ANP

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Matt,  
Here are my major and non-major examples of requirements not being met.

Major: Insufficient to judge PM10 network in Coachella Valley since high site in S. Coachella Valley may be needed.

Non-major:

-trees too close (6m) at LA Basin's DV site  
-not all PM2.5 sites are operating at appropriate schedules or with waivers

I am only through 1/2 the sites so that's just list to-date.

-Meredith  
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